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*Re: Comments on proceeding 17-105.*

To whom it may concern,

I am requesting that the FCC eliminate Section 73.860(e), or modify it to allow LPFM simulcasts or other collaboration possibilities between two LPFMs.

KXRN-LP, broadcasting in Laguna Beach, is a successful radio station with 100+ volunteers, five full time staff, and a dedicated listener base in our community. We are neighbored to the North by Newport Beach/Costa Mesa, which also has an LPFM - KOCI-LP.

Newport Beach residents and Laguna Beach residents are interested in similar news, local happenings, and public affairs programming. We believe we could better serve both communities by teaming up. We seek to do one of the following:

- Be able to simulcast content from KXRN-LP to KOCI-LP
- Be able to translate KXRN-LP to KOCI-LP
- Be able to purchase and own KOCI-LP through our existing company Laguna Radio Inc

Currently, Section 73.860(e) forbids these types of collaborations between LPFMs because, in my understanding, it goes against the intention of an LPFM to “expand” because it’s no longer focused on covering its immediate community. But we believe, that in some cases like ours, the “community” is bigger than one single LPFM can cover, and it can require a successful collaboration between two in order to make an impact.

Further, in this case, KOCI-LP is *not* as successful of a radio station, with a smaller budget, less updated broadcasting equipment, and struggles to fill airtime. If the FCC is willing to eliminate or modify section 73.860(e) to allow simulcasts, translating, or

ownership of a second LPFM, listeners in some larger communities like ours would be better served.